

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, defendants Tower Painting Co., Inc. ("Tower Painting") and Liberty Mutual Insurance Company ("Liberty Mutual"), by their attorney, George A. Marco, PLLC, submit this Rule 7.1 Disclosure Statement to enable Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, certifying that Tower Painting a privately held company with no parent companies, affiliates and/or subsidiaries which are publicly held and that Liberty Mutual is a Massachusetts Corporation; Liberty Mutual Group, Inc. is the parent corporation of Liberty Mutual; LMHC Massachusetts Holdings, Inc. is the parent corporation of Liberty Mutual Group Inc.; Liberty Mutual Holding Company Inc. is the parent corporation of LMHC Massachusetts Holdings Inc.; no publicly held corporation owns 10% or more of Liberty Mutual's stock (LMG owns 100% of Liberty Mutual's

MUTUAL INSURANCE COMPANY,

TOWER PAINTING CO., INC. AND LIBERTY

-against-

Plaintiffs,

JUDGE KARAS

INSURANCE AND ANNUITY FUNDS,

DISTRICT COUNCIL 9 PAINTING INDUSTRY

EMPLOYEE TRUST FUNDS AND TRUSTEES OF THE:

BRIDGE PAINTERS OF GREATER NEW YORK

TRUSTEES OF THE STRUCTURAL STEEL AND

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Docket No.: 07-CV-10519
RULE 7.1 DISCLOSURE
STATEMENT

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/s/

Respectfully,

Dated: New York, New York
March 3, 2008